

DIRECTOR OF CENTRAL INTELLIGENCE

**Security Committee**

SECOM-D-126

5 March 1980

MEMORANDUM FOR: Special Assistant to the DCI  
for Compartmentation

FROM:



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SUBJECT: Implementation of APEX Subcompartments

1. There have been several questions raised about the concept of subcompartments in the APEX System and how they would be implemented. The Navy member of the APEX Steering Group recently posed several questions in this regard. You have agreed to meet with his [redacted] element for further discussion and asked me to accompany you. This memorandum sets forth for your review my perceptions of subcompartments, what they are and how they are to work. If these views are different from yours, or if they fail to take into consideration aspects of the issue that have come to your attention, perhaps we should discuss them prior to meeting with Navy.

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2. The concept of subcompartments arose in force recognition of the need for a select group of individuals to have access to some information currently grouped under the generic heading of "operational data."

3. I say "forced recognition" for several reasons. First, the goals of APEX included the separation from all product intelligence of details of sources and methods. This included the traces of control, the labels of controls as well as substantive source data. It was recognized

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that the sticky tentacles of the [ ] Control System, the SI System and the [ ] Control System continued to show on many finished intelligence products. This restricted what was viewed as a desirable feature of a new system - i.e., broader dissemination of product. Another aspect of the desire to separate source from product arose from the recognition that the imposition by the collectors of their controls over product had the undesirable results of cutting too many people in on our operational details. And there was no gradation of this access.

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4. In our (NFIB Working Group) review of what was operational data and what was product, it rapidly became evident that the collectors had extended the definition of "operational data" beyond reasonable and prudent grounds and had in consequence caused resentment in a significant segment of the consumer population who pushed hard for redress. Second, there is a logical progression of actions leading to the publication of finished intelligence from collection (which includes a legitimately wide range of activities), through processing of raw data to intelligible form, through analytical evaluation (including assessment of reliability and timeliness as well as substantive content), to publication, and finally dissemination to consumers (who require some measure of assurance of reliability of source data - but a little less than analysts). Unfortunately, this progression in action does not lend itself to neat, clean defined steps. There are overlaps and gray areas that make the best efforts at division very difficult at the least. So, it is easier to hypothesize a nice, neat break and simpler to say, "Let's do it," than it is to accomplish it.

5. In this connection we again see a reflection of provincialism on the part of the collectors. They perceive their collected material not as raw data with which something must be done by somebody else on a team before it becomes finished intelligence, but rather as an end in itself. This perception puts the processors, analysts, resource managers, and even tasking officers on a separate team. And, as a condition of allowing others to play with their material, the collectors insisted that their control rules be followed. Even further, the collectors exercised, by claimed right the authority to grant the

license to players. They insisted on an overview determination on need-to-know. A considerable animus in the consumer population has festered over the years because of this.

6. Acknowledging only reluctantly the essential requirement to do something with the collected data before it could serve the Community in any meaningful fashion, the collectors prepared project manuals. These were originally intended for a small group of photo interpreters or COMINT analysts. Shortly afterwards, however, the COMINT collectors recalled all such material. The Imagery collectors on the other hand, seeing advertising advantage or for whatever reason, elected to publish bigger and better project manuals [REDACTED] They allowed these manuals to be controlled in the much broader based TK system. We now find the environment of the SCI world in a dichotomous situation - no or too little information available to those who need it, or too much operational material easily available to those who don't. I believe this condition disturbed both extremes of the population and contributed to the pressures and the ultimate review that led to APEX.

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7. In the attempt to arrive at a solution, the NFIB Working Group reviewed a large volume of product material and identified considerable amounts that flat out did not warrant compartmented protection; identified a volume that was questionable; and identified another volume that was evidently compartmented because it had "information about" operations and another volume that was accepted as operational. There wasn't much of an effort to segregate these last two categories - perhaps this should be given some additional attention by the Steering Group.

8. The review process recognized the need for access to "some" but not all operational data by a select group doing processing and analytical work, and a different portion needed by tasking officers and resource managers. There was no attempt in the course of the review to identify with any precision either the size or nature of the population(s) involved or the categories of information that would be needed.

9. Attention was given to the continued and continuing claim of program managers that they alone control release of data about their programs. This claim was not

openly challenged but there was considerable sentiment expressed in the course of long debates that such a closed position did not acknowledge that SIOs were in a position better to determine the need-to-know of their populations. It became evident that a compromise position was essential if the goals of the exercise were to be accomplished.

10. The form of the compromise was the concept of operational subcompartments. Operational subcompartments were to encompass that volume of information which would be identified in joint discussions between representatives of SIOs involved in processing, analyzing and preparing finished intelligence, products; representatives of the Community elements associated with tasking and resource management; and representatives of the national collection programs. The requirements of the analysts, processors, tasking officers and resource managers would be clearly stated to the program managers. These presentations are not to be made as a supplication or petition but are to be accepted as good grace statements of processor/producer needs.

11. Program managers are to receive these needs in the same spirit of good grace neither challenging the appropriateness of the request nor questioning the presumption of need-to-know. Program managers are to make every effort to provide full and satisfactory responses to the requirements. They are not to use the opportunity to prepare advertising brochures or to gratuitously broaden the scope of needed information.

12. The form of the response would be a paper - a so called operational subcompartment manual. This product would be presented to the requestor by the program manager. At this point, control over the information - the operational subcompartment manual - passes from the program manager to the requesting SIO.

13. It then becomes the responsibility of the receiving SIO to exercise good faith application of need-to-know in distributing the operational subcompartment manual. The manual will provide the SIO with information about some aspects of the operational project. Through careful examination of its contents, the SIO will find

guidance to determine who needs the information to do his job. Those individuals will be provided with the manual. They will be identified to the Central Registry as authorized access to the operational subcompartment. The identification process is the responsibility of the SIO.

14. There was no intent, nor even discussion of the idea, that the SIO would make available to program managers for whatever reason, the identities of or a count of personnel to whom the subcompartment manual was given and for whom access was authorized.

15. This process of having the program manager or director prepare the operational subcompartment manual with the full participation of the "user" (in a very narrow context) Community was viewed as serving the dichotomous (if not antagonistic) requirements of both elements. The "user" (noncollector) element would have full opportunity to express his needs and have them satisfied without hassle within the bounds of common sense and good faith. The program manager would be in the position of not having to provide anything unless he was asked to do so, and then to provide only that information minimally required to satisfy the request.

16. Both sides faced the need to compromise on currently held positions. The user side has to quantify and qualify its requests. The collectors have to provide and relinquish control over some material. Both sides benefit. The user receives what he needs to know. The collector has a prime opportunity to limit the scope of release of operational project data. The Intelligence Community benefits as a whole by providing the mechanism to further separate source data from product data, quell the growing dispute over jurisdictional control of information and satisfy the needs of other members of the intelligence team who are required to use the information in processing data toward finished intelligence.

17. That was the way the operational subcompartment concept was envisioned and that was the intent of paragraph number 7 on page 12 of the Final Report of the NFIB Working Group on Compartmentation. It was recognized that

the concept does not equate on a one-to-one basis with the way we do business now. But the reason for APEX was because the old way failed to provide satisfaction to perceived needs.

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